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April 1, 2005

The Dow Chemical Company  
Midland, Michigan 48674  
USA

Via Certified Mail 7000 1530 0005 1754 9384

Jim Willis (7405M)  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Diane Sheridan (7405M)  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

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**CASRN 94-75-7, 2,4-DICHLOROPHENOXYACETIC ACID  
PUBLICLY AVAILABLE INFORMATION TO ADDRESS EPA HPV CHALLENGE**

Dow is providing publicly available hazard information for the endpoints identified in the EPA HPV Challenge for 2,4-dichlorophenoxyacetic acid. As indicated to the Agency in previous communications, this substance is a pesticide regulated by FIFRA in the U.S. and is used exclusively as an intermediate to another pesticide. Dow believes these conditions are sufficient to exempt this substance from the EPA HPV Challenge. Nearly five years after our request for exemption of 2,4-dichlorophenoxyacetic acid from the EPA HPV Challenge, the Agency notified Dow our request was not accepted. November 11, 2004, Dow sent a letter to EPA stating its commitment to provide publicly available information on the substance for the endpoints within the EPA HPV Challenge.

The EPA Reregistration Eligibility Decision (RED) Document is scheduled to publish by EPA in May of this year as Case 0073: <http://cfpub.epa.gov/oppre/rereg/status.cfm?show=rereg> The RED will contain publicly available information for EPA HPV endpoints.

Until publication of the RED document, information addressing all the endpoints within the scope of the EPA HPV Challenge is publicly available through the docket, OPP-2004-0167. Documents in the docket include physical and chemical properties, toxicology study results for acute, subchronic, chronic, developmental, reproductive, mutagenicity, metabolism, dermal absorption endpoints as well as epidemiological information, environmental fate and transport results, and ecological testing results in aquatic and terrestrial plants and animals.

We believe this submission satisfies the EPA HPV Challenge commitment to provide publicly available basic health and safety information on this substance.

We also request this substance be removed from EPA's HPV Orphans List and Annex A of the 55<sup>th</sup> ITC Report.

Sincerely,

Linda C. Burgert  
EH&S Product Regulatory Management  
PH: 989-636-1011  
FAX: 989-638-9933  
E-MAIL: [lburgert@dow.com](mailto:lburgert@dow.com)

jt

cc: John Walker, USEPA Headquarters, Washington, DC